

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP

2 Sean Pak (Bar No. 219032)

seanpak@quinnmanuel.com

3 Melissa Baily (Bar No. 237649)

melissabaily@quinnmanuel.com

4 James Judah (Bar No. 257112)

jamesjudah@quinnmanuel.com

5 Lindsay Cooper (Bar No. 287125)

lindsaycooper@quinnmanuel.com

6 Iman Lordgooei (Bar No. 251320)

imanlordgooei@quinnmanuel.com

7 50 California Street, 22nd Floor

8 San Francisco, California 94111-4788

Telephone: (415) 875-6600

Facsimile: (415) 875-6700

9 Marc Kaplan (*pro hac vice*)

marckaplan@quinnmanuel.com

10 191 N. Wacker Drive, Ste 2700

Chicago, Illinois 60606

11 Telephone: (312) 705-7400

Facsimile: (312) 705-7401

12 *Attorneys for GOOGLE LLC*

13

14 UNITED STATES DISTRICT COURT

15 NORTHERN DISTRICT OF CALIFORNIA

16 SAN FRANCISCO DIVISION

17 SONOS, INC.,

Case No. 3:20-cv-06754-WHA
Related to Case No. 3:21-cv-07559-WHA

18 Plaintiff,

**GOOGLE'S ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIAL
SHOULD BE SEALED**

19 vs.

20 GOOGLE LLC,

21 Defendant.

22

23

24

25

26

27

28

Case No. 3:20-cv-06754-WHA

GOOGLE'S ADMINISTRATIVE MOTION TO CONSIDER WHETHER ANOTHER PARTY'S MATERIAL
SHOULD BE SEALED

1 **I. INTRODUCTION**

2 Pursuant to Civil Local Rule 79-5(f), Google LLC (“Google”) respectfully submits this
 3 Administrative Motion to Consider Whether Another Party’s Material Should Be Sealed in
 4 connection with its Response to Sonos’s Request Re: No Longer Asserted Patents (Dkt. 699) and
 5 Proffer of Testimony of Alaina Kwasizur (Dkt. 715) (“Response to Request and Proffer”). Certain
 6 portions of documents filed in support thereof contain information that Sonos, Inc. (“Sonos”) may
 7 consider confidential pursuant to the Stipulated Protective Order (“Protective Order”) entered by
 8 this Court. Dkt. 94. Accordingly, Google seeks to file under seal the documents and information
 9 as listed below:

Document	Portions to Be Filed Under Seal	Designating Party
Response to Request and Proffer	Portions highlighted in green	Google Sonos
Exhibit 2	Entire Document	Google and Sonos

14 Materials and documents may be provisionally filed under seal pursuant to Civil Local Rule
 15 79-5(f) when the document, or portions thereof, “has been designated as confidential by another
 16 party or non-party.” L.R. 79-5(f). Google has submitted portions of its Response to Request and
 17 Proffer under seal because information therein may be considered “CONFIDENTIAL” and/or
 18 “HIGHLY CONFIDENTIAL—ATTORNEYS’ EYES ONLY” under the Protective Order by
 19 Sonos.

20 In compliance with Civil Local Rule 79-5(d) and (e), an unredacted version of Google’s
 21 Response to Request and Proffer accompanies this Administrative Motion and a redacted version of
 22 Google’s Response to Request and Proffer has been filed publicly. In accordance with Local Rule
 23 79-5(c)(3), Google has also filed a Proposed Order herewith.

25 DATED: May 11, 2023

26 QUINN EMANUEL URQUHART & SULLIVAN,
 27 LLP

1 By: /s/ Lindsay Cooper
2 Lindsay Cooper

3 *Attorneys for GOOGLE LLC*

4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

2 Pursuant to the Federal Rules of Civil Procedure and Local Rule 5-1, I hereby certify that,
3 on May 11, 2023, all counsel of record who have appeared in this case are being served with a copy
4 of the foregoing via the Court's CM/ECF system and email.

6 || DATED: May 11, 2023

By: /s/ Lindsay Cooper
Lindsay Cooper